

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOHN T. LAMONT and
PRESTON POULTER,

Plaintiffs,

v.

DEAN ASSAF A/K/A DA TALK;
VICTORIA KUNDERT A/K/A
VIKKIVERSE, AND ETHAN VAN
SCIVER,

Defendants.

Civil Action No. 3:21-CV-1176-K

DECLARATION OF ALI ASSAF

I, Ali Assaf, declare as follows:

1. I am a Defendant in this lawsuit, and I am knowledgeable about all exhibits prepared for this motion.
2. The following exhibits are true and correct copies of the public record and documents exchanged between the parties to this lawsuit..
3. **Exhibit 1** is a true and correct copy of the Rule 11 Letter sent to Plaintiffs on June 20, 2023.
4. **Exhibit 2** is a true and correct copy of Plaintiffs' Rule (26) Initial Disclosures.
5. **Exhibit 3** is a true and correct copy of Plaintiffs' Supplement Rule (26) Initial Disclosures.
6. **Exhibit 4** is a true and correct copy of Defendant Ali Affaf's response to Plaintiffs' Supplement Rule (26) Initial Disclosures.
7. **Exhibit 5** is a true and correct copy of an Annotated copy of Plaintiffs' First Amended Complaint. [Dkt.6]

8. **Exhibit 6** is a true and correct copy of Plaintiff Preston Poulter's crowdfund campaigns and revenue derived from publicly available information linked in the document. URLs last visited on July 15, 2023.
9. **Exhibit 7** is a true and correct copy of Plaintiff Lamont's crowdfund campaigns and revenue derived from publicly available information linked in the document. URLs last visited on July 15, 2023

I declare under penalty of perjury that the foregoing is true and correct and, if sworn as a witness, I could and would testify thereto.

Dated this 17th day of July 2021 at Manteca, CA USA.

/Ali Assaf/
Ali Assaf